

AUG 25 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

United States District Court For The
Northern District of Illinois
Eastern Division

Melvin Ford-EI
Plaintiff

vs.

Coles, et al.,
Defendants

No. 19CV 50074

Judge Matthew Kennelly

Plaintiff's STATUS Report

Plaintiff hereby submit this status report in response to the Court's Order dated June 24, 2020, directing each party to file a status report on the topics identified numerically below.

- 1) The names of all persons who have information that the party may need to support its claims or defenses, and a short summary of the topic(s) of the person's possible testimony.

- a) Melvin Ford-EI, Plaintiff: Plaintiff is expected to testify as to his knowledge of all of the allegations set forth in his Amended Complaint and any damages he allegedly sustained.
- b) The IDoc Defendants: All named defendants (and all defendants whom may be later identified) are expected to testify as to their roles and responsibilities ~~and actions~~ ~~in the~~ in the relation to their employment with

the IDOC, and their knowledge regarding the facts and circumstances alleged in Plaintiff's Amended Complaint, as well as what action (if any) they took to protect Plaintiff's constitutional rights, and if they had any training on the constitutional rights of prisoners and how many hours, ~~and the IDOC~~

c) Other IDOC witnesses: All unknown sergeants, Lieutenants, Majors, Assistant Wardens, ~~and~~ Warden(s), and correctional officers, whom worked at the IDOC Stateville's Northern Receiving Center from January 1st, 2018 through December 31st, 2019, are expected to testify as to their roles and responsibilities in relation to their employment with the IDOC, and their knowledge regarding the facts and circumstances alleged in Plaintiff's Amended Complaint, as well as what action (if any) they took to protect Plaintiff's constitutional rights, and if they had any training on the constitutional rights of prisoners and how many hours.

d) Other witnesses: DeQuavious Lee, Michael Rankins Jr., Johntavies King, Darnell Davenport, Stephen Hambrick, Nicholas Crum, Darnell ~~Lee~~ Abrams (Inmate numbers V30140, M50907, M38695, Y29261, M43418, V36787, M10768 - respectively) and every inmate that was in a cell with Plaintiff from 6-19-2018 through 6-28-2018 and 08-29-2018 through 9-12-2018 and from 10-24-2018 through 11-07-2018 and every inmate that was housed on the same "wing" as Plaintiff on all of those respective dates are expected

to testify as to ~~their~~ knowledge of all of the allegations and facts set forth in Plaintiff's Amended complaint and testify to their personal experiences of IDOC policy ~~and~~ rules, grievance process, and conditions at Stateville Northern Receiving Center.

- e) Any persons identified in Defendants' Status report in response to the Court's Order dated June 24, 2020

The Plaintiff's above disclosures are based upon information known and reasonably available to him.

Fact discovery is ongoing. Plaintiff reserves the right to amend, supplement, modify, or correct his disclosures as additional information becomes available.

- 2) A description, by category, of any documents that the party may need to obtain from the other side or from third parties to support ~~its~~ ^{its} claims or defenses.

- a) Any documents identified in ~~defendant's~~ ^{defendant's} status report in response to the Court's Order dated June 24, 2020

- b) Stateville's NRC policy on inmate recreation time

- c) Stateville's NRC policy on cleaning chemicals, ~~mops~~, brooms, and other sanitizers for inmate use

- d) Stateville's NRC policy on inmate orientation to explain grievance processes, rules, etc.

- e) Any inmate ~~and~~ ^{and} staff complaints/grievances/reports on the ~~allegations~~ allegations similar to those alleged by Plaintiff in the complaint (past and present).

- f) Nurse/Doctor sick call policy and processes
- g) Documentation proving prison employees were and/or weren't trained on the Constitutional Rights of Prisoners and the number of hours (if any) required for training.
- h) The names of all unidentified defendants "named" in Plaintiff's Amended Complaint.

The Plaintiff's above disclosures are based upon information known and reasonably available to him. Fact discovery is ongoing. The Plaintiff reserves the right to amend, supplement, modify, or correct his disclosures as additional information becomes available.

3) A description, by category, of any documents that the party has in its possession or control that it may use to support its claim or defenses:

- a) Plaintiff grievance dated 10/25/2018.
- b) Affidavits/Declarations from inmates labeled Exhibits A-F.

The Plaintiff's above disclosures are based upon information known and reasonably available to him. Fact discovery is ongoing. Plaintiff reserves the right to amend, supplement, modify, or correct his disclosures as additional information becomes available.

Respectfully submitted,

Dated: 8-12-2020

Melvin Ford-El, EX Rel. MELVIN FORD

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Attn: Judge Kennelly

To the best of my ability I have filed this
Status report. I tried "fashioning" it after the Status
report sent to me by the defense. I'm unsure if
it is all I need.

Mel A. Finkel
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08-12-2020

Certificate of Service

The undersigned certifies that on August 12, 2020, he sent by institutional mail, from Graham Corr. Center, to the Clerk of the Court for the United States District Court for the Northern District of Illinois, the enclosed Status Report, after 7pm.

MELANIE J. WEL

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08-12-2020

Melvin Ford-EI
#M48792

Graham C.C.
12078 Illinois Rte. 185
Hillsboro, Illinois
62049

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